

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar # 11479
WILLIAM CARRICO
3 Assistant Federal Public Defender
Nevada State Bar # 003042
4 411 E. Bonneville Avenue, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577
(Fax) 388-6261

6 Attorney for Rolando Pascual

7 UNITED STATES DISTRICT COURT
8
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 vs.

13 ROLANDO PASCUAL,

14 Defendant.

Case No.: 2:11-cr-00431-PMP -RJJ

EMERGENCY MOTION FOR ORDER
DIRECTING PAYMENT OF
TRANSPORTATION EXPENSES

15 Rolando Pascual, the Defendant named above, through counsel, William Carrico,
16 Assistant Federal Public Defender, moves this Honorable Court for its order directing the United
17 States Marshal to pay subsistence and travel expenses for airfare necessary for the defendant to travel
18 from his home in Darien, Illinois to Las Vegas, Nevada, on Tuesday, November 13, 2012 before
19 2pm. This Court has requested that Mr. Pascual appear in court in the above-entitled matter for the
20 purpose of a Change of Plea hearing. It will be necessary for Mr. Pascual to present himself at the
21 Office of Pretrial Services on Tuesday, November 13, 2012 as further ordered by this Court.

22 Court appearances are currently scheduled for Tuesday, November 13, 2012 at the
23 hour of 4:00 p.m., PST. at the District of Nevada at the Federal Courthouse, 333 Las Vegas Blvd.,
24 South, Las Vegas, Nevada.

25 Dated this 8th day of November, 2012.

26 By: /s/ William Carrico
27 WILLIAM CARRICO
28 Assistant Federal Public Defender

1 **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF EX PARTE**
2 **MOTION FOR ORDER DIRECTING PAYMENT OF TRANSPORTATION EXPENSES**

3 Title 18 U.S.C. §4285 provides that any United States judge may direct the United
4 States Marshal to arrange for the payment of the subsistence and travel expenses of a defendant who
5 has been released on bail and who is obligated to make a subsequent appearance in any United States
6 court when the interests of justice would be served thereby and the judge or magistrate is satisfied
7 that the defendant is financially unable to provide the necessary transportation to appear in Court.

8 Defendant is currently residing in Darien, Illinois. Mr. Pascual is indigent as indicated
9 in his financial affidavit on file in this case. He is unable to pay the entire cost of transportation to
10 and from Las Vegas, Nevada. Mr. Pascual will not require per diem funds for lodging as he
11 maintains a residence in the Las Vegas area. This hearing is set for a time when he finds himself
12 with family in Chicago, but without funds to travel back and forth.

13 Because of his lack of funds, the defendant will be unable to travel from his home,
14 to Las Vegas, Nevada, unless this Court directs the United States Marshal to pay his necessary travel
15 and subsistence expenses.

16 DATED this 8th day of November, 2012.

17 Respectfully submitted,

18 RENE L. VALLADARES,
19 Federal Public Defender

20 By: /s/ William Carrico
21 WILLIAM CARRICO,
22 Assistant Federal Public Defender
23 Counsel for Roland Pascual
24
25
26
27
28

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 * * *

4 UNITED STATES OF AMERICA,

Case No.: 2:11-cr-00431-PMP -RJJ

5 Plaintiff,

6 vs.

ORDER DIRECTING PAYMENT OF
TRANSPORTATION EXPENSES

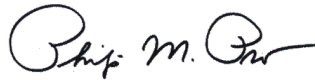
7 ROLANDO PASCUAL,

8 Defendant.

9 On the motion of defendant Rolando Pascual, made pursuant to 18 U.S.C. §4285, and
10 good cause appearing therefor,

11 IT IS HEREBY ORDERED that the United States Marshal shall arrange for the
12 defendant's non-custodial transportation, or furnish the fare for such transportation, to Las Vegas,
13 Nevada, from Darien, Illinois, on or before Tuesday, November 13, 2012, for the purpose of making
14 a court appearance before this Court in the above entitled case. Mr. Rolando Pascual is scheduled
15 to appear in Court on Tuesday, November 13, 2012 at the hour of 4:00 p.m. Additionally, the United
16 States Marshal will make the reservations for defendant's return flight and the defendant will pay
17 the cost of the flight to the United States Marshal's office directly, prior to departing from Las
18 Vegas, Nevada. The reimbursement shall be made in the form of cash, United States Money Order,
19 or cashier's check.

20 DATED this __ 9th day of November, 2012.

21
22 

23 UNITED STATES DISTRICT COURT JUDGE
24
25
26
27
28